BEFORE THE POSTAL RATE COMMISSION

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MOTION OF UNITED PARCEL SERVICE FOR LEAVE
TO FILE NOTICES OF INTENT TO CONDUCT ORAL CROSS EXAMINATION
OF UNITED STATES POSTAL SERVICE WITNESS
NANCY R. KAY (USPS-RT-13) ONE DAY LATE
(August 22, 2000)

United Parcel Service ("UPS") hereby moves that it be granted leave to file one day late the attached Notice of Intent to Conduct Oral Cross Examination of United States Postal Service Witness Nancy R. Kay (USPS-RT-13). The delay in filing this notice is due to the press of business. The Postal Service has authorized UPS to represent that it has no objection to the instant motion

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP 3400 Two Logan Square 18th & Arch Streets Philadelphia, PA 19103-2762 (215) 656-3310 (215) 656-3301 (FAX) and 1200 Nineteenth Street, NW Washington, DC 20036-2430 (202) 861-3900 Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Phillip E. Wilson, Jr.

Attorney for United Parcel Service

Dated: August 22, 2000

Philadelphia, Pa.

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